

Introduction
What are they?
Why are they important?
Permit Conditions
BMPs



Introduction

Why me?

Boeing Appeal of 2002 Permit

Why appeal?

2002 Permit made all non-stormwater "Illicit"

2003 Settlement

Based on 2000 EPA MSGP

Where do we go from here?



What are they?

Fire Protection System Testing & Maintenance





Wet System Valve







What are they?

Fire Protection System Testing & Maintenance

Irrigation Water or Other Potable Water

Atmospheric Condensate

Cooling Tower Mist

Dewatering of Uncontaminated Water from Vaults and Foundations



Why are they important?

Fire protection system testing and maintenance required by local fire code and insurance conditions

Others are common incidental discharges of either potable water, spray, condensate, or collected uncontaminated stormwater/groundwater

Permit must be protective but should not create an un-productive burden



Permit Conditions

Inventory

- Site Inspection
- Engineering Data

Characterize Flow and Likely Pollutants

- Field Observation
- Engineering Data
- Possibly Sampling Data

Pollutant Evaluation for Cooling Tower Mist

Reasonable Source Control BMPs

Other BMPs if necessary



Some possible Source Control BMPs

Reroute fire protection system discharges and other potable water discharges to sanitary where feasible and allowed by POTW

Maintain irrigation systems to minimize discharges



Pause for Questions on

Conditionally Permitted Non-Stormwater Discharges



Stormwater Discharges from Offsite

Permittee may be sampling combined flow

Option exists to sample only permittee flow

Option exists to sample flow from offsite



Thank You!

